

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

**TOMAS DUEÑO ESPADA
MERCEDES LUGO RODRIGUEZ**

DEBTOR

CASE NO.: 16-00470-ESL

CHAPTER 13

MOTION AMENDING SCHEDULE G

TO THE HONORABLE COURT:

COME NOW debtors through the undersigned attorney and very respectfully state and pray as follows:

- 1) Schedule G needs to be amended to correct executor contracts.
- 2) Schedule G is hereby amended and filed.

WHEREFORE debtor respectfully prays from this Honorable Court to allow the amended Schedule B in substitution of the one previously filed.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

Notice is hereby given that a Motion Amending Schedule G has been filed by Debtor.

Within FOURTEEN (14) DAYS AFTER SERVICE as evidenced by the certification, and an additional three (3) days pursuant Fed. R. Bank P. (9006) (f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief or remedy sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you file a timely response, the court may-in its discretion-schedule a hearing.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this same date of filing a copy of this motion has been forwarded to every creditor in the master list address that do not have electronic filing records and for those who have the notification has been made by means of the CM/ECF System, including the Chapter 13 Trustee and the U.S. Trustee for the District of Puerto Rico.

In Carolina Puerto Rico on May 14, 2016.

MORENO & MORENO LAW OFFICE
/s/ROSANA MORENO RODRIGUEZ
ATTORNEY FOR DEBTOR
USDC #221903
P.O. BOX 679
TRUJILLO ALTO, PR 00977
PHONE: (787) 750-8160 / 8166 / (787) 287-4116
FAX: (787) 750-8243
EMAIL: rmoreno@morenosolterolaw.com

Fill in this information to identify your case:

Debtor 1	TOMAS M. DUEÑO ESPADA		
	First Name	Middle Name	Last Name
Debtor 2 (Spouse if, filing)	MERCEDES E. LUGO RODRIGUEZ		
	First Name	Middle Name	Last Name
United States Bankruptcy Court for the:	DISTRICT OF PUERTO RICO, SAN JUAN DIVISION		
Case number (if known)	<u>16-00470 ESL</u>		

Check if this is an amended filing

Official Form 106G

Schedule G: Executory Contracts and Unexpired Leases

12/15

Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, copy the additional page, fill it out, number the entries, and attach it to this page. On the top of any additional pages, write your name and case number (if known).

1. Do you have any executory contracts or unexpired leases?
 No. Check this box and file this form with the court with your other schedules. You have nothing else to report on this form.
 Yes. Fill in all of the information below even if the contacts of leases are listed on *Schedule A/B:Property*(Official Form 106 A/B).
2. List separately each person or company with whom you have the contract or lease. Then state what each contract or lease is for (for example, rent, vehicle lease, cell phone). See the instructions for this form in the instruction booklet for more examples of executory contracts and unexpired leases.

Person or company with whom you have the contract or lease
Name, Number, Street, City, State and ZIP Code

State what the contract or lease is for

2.1	6 shorterm \$60.00 weekly	6 short term \$60.00 weekly Calle Tapia. \$1,560.00
2.2	DEBORAH SANTIAGO	\$325 Golden Hills
2.3	JOSE MUÑOZ	\$325 - Golden Hills
2.4	MARGARET DUEÑO	\$325.00 PER MONTH AT CUPIDO 631, VENUS GARDENS.
2.5	SRA. MENDEZ CRUZ	\$325 Golden Hills
2.6	WILDA GARRASTEGUI	\$400 per month contract Golden Hills

Fill in this information to identify your case:

Debtor 1	TOMAS M. DUEÑO ESPADA	
	First Name	Middle Name
Debtor 2	MERCEDES E. LUGO RODRIGUEZ	
(Spouse if, filing)	First Name	Middle Name
United States Bankruptcy Court for the:	DISTRICT OF PUERTO RICO, SAN JUAN DIVISION	
Case number (if known)	<u>16-00470</u>	

Check if this is an amended filing

Official Form 106Dec

Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Sign Below

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

No

Yes. Name of person _____

Attach *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119)

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

/s/ TOMAS M. DUEÑO ESPADA

TOMAS M. DUEÑO ESPADA

Signature of Debtor 1

Date May 14, 2016

/s/ MERCEDES E. LUGO RODRIGUEZ

MERCEDES E. LUGO RODRIGUEZ

Signature of Debtor 2

Date May 14, 2016

ADVANCE COLLECTION SERVICES, INC.
PO BOX 364607
SAN JUAN, PR 00936-4607

ATT
ONE AT&T WAY, ROOM 3A104
BEDMINSTER, NJ 07921

BANCO POPULAR DE PR
PO BOX 70100 CARD PRODUCTS DIVISION
SAN JUAN, PR 00936

BANCO POPULAR DE PR
MORTGAGE SERVICING DEPARTMENT
PO BOX 362708
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BANCO POPULAR DE PUERTO RICO
PO BOX 366818 BANKRUPTCY DEPARTMENT
SAN JUAN, PR 00936-6818

BAUTISTA CAYMAN ASSET COMPANY
CAPITAL CROSSING PUERTO RICO LLC
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HATO REY, PR 00918

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PO BOX 8318 DEPARTAMENTO DE HIPOTECAS
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PO BOX 195389 ATTORNEY OF DORAL BANK
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NW MANAGEMENT GROUP INC
URB EL CEREZAL CALLE PARANA #1650
SAN JUAN, PR 00926

POPULAR AUTO
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PR ACQUISITIONS, LLC
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RUSHMORE LOAN MANAGEMENT SERVICES
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TOYOTA CREDIT DE PR
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